

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CITY OF LAKELAND EMPLOYEES)	Case No. 1:10-cv-06016
PENSION PLAN, Individually and on Behalf)	
of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	Assigned to: Judge John J. Tharp, Jr.
)	
vs.)	
)	
BAXTER INTERNATIONAL INC., et al.,)	
)	
Defendants.)	
)	
)	

LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS, AND AN
AWARD OF ATTORNEYS' FEES AND EXPENSES

Lead Plaintiff, on behalf of the Class and pursuant to Rule 23 of the Federal Rules of Civil Procedure, respectfully moves this Court to enter orders and/or judgments: (1) granting final approval of the settlement in the above-captioned litigation; (2) approving the Plan of Allocation of settlement proceeds; and (3) awarding attorneys' fees and expenses to Lead Counsel. This motion is based on the Memorandum of Points and Authorities in Support of Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds, and the Memorandum of Points and Authorities in Support of Motion for an Award of Attorneys' Fees and Expenses, the declarations submitted in support thereof, the Amended Settlement Agreement dated August 27, 2015, all other pleadings and matters of record, and such additional evidence or argument that may be presented at the hearing on this matter.

DATED: December 4, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ROBERT J. ROBBINS
BAILIE L. HEIKKINEN
KATHLEEN B. DOUGLAS
HOLLY W. KIMMEL
JANINE D. ARNO

s/ Robert J. Robbins
ROBERT J. ROBBINS

120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SPENCER A. BURKHOLZ
JEFFREY D. LIGHT
TOR GRONBORG
JONAH H. GOLDSTEIN
JASON A. FORGE
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Lead Plaintiff

MILLER LAW LLC
MARVIN A. MILLER
MATTHEW E. VAN TINE
LORI A. FANNING
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603
Telephone: 312/332-3400
312/676-2676 (fax)

Liaison Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 4, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means.

/s/ Robert J. Robbins
ROBERT J. ROBBINS

Mailing Information for a Case 1:10-cv-06016 City of Lakeland Employees Pension Plan v. Baxter International Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Janine D Arno**
jarno@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_fl@rgrdlaw.com
- **James E Barz**
jbarz@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Spencer A Burkholz**
spenceb@rgrdlaw.com
- **Kathleen Barber Douglas**
kdouglas@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_fl@rgrdlaw.com
- **Lori Ann Fanning**
LFanning@MillerLawLLC.com,MMiller@MillerLawLLC.com,ajewell@millerlawllc.com,drobinson@millerlawllc.com,JRamirez@millerlawllc.com
- **Jason Adeeb Forge**
jforge@rgrdlaw.com,E_File_SD@rgrdlaw.com,tholindrake@rgrdlaw.com
- **Michael Jerry Freed**
mfreed@fkmlaw.com,mkhamoo@fkmlaw.com
- **Andrew J Fuchs**
afuchs@skadden.com,chdocket@skadden.com
- **Jonah Harry Goldstein**
jonahg@rgrdlaw.com
- **Tor Gronborg**
torg@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Matthew Thomas Heffner**
mheffner@heffnerhurst.com,mhurst@heffnerhurst.com
- **Bailie Heikkinen**
bheikkinen@rgrdlaw.com
- **Steven A Kanner**
skanner@fkmlaw.com
- **Holly Wiseberg Kimmel**
hkimmel@rgrdlaw.com
- **Matthew Robert Kipp**
mkipp@skadden.com,chdocket@skadden.com
- **Leigh R. Lasky**
lasky@laskyrifkind.com
- **Jeffrey D. Light**
jeffl@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Donna L. McDevitt**
dmcdevit@skadden.com,chdocket@skadden.com
- **Marvin Alan Miller**
Mmiller@millerlawllc.com,ajewell@millerlawllc.com,LFanning@millerlawllc.com,drobinson@millerlawllc.com,JRamirez@millerlawllc.com
- **Amelia Susan Newton**
amy@attorneyzim.com
- **Norman Rifkind**
Norman@rifslaw.com
- **Robert J. Robbins**
rrobbins@rgrdlaw.com,e_file_sd@rgrdlaw.com,cthorton@rgrdlaw.com,hkimmel@rgrdlaw.com,e_file_fl@rgrdlaw.com,ckent@rgrdlaw.com
- **Donald Lewis Sawyer**
dsawyer@fkmlaw.com,mkhamoo@fkmlaw.com

- **Judith S. Scolnick**
jscolnick@scott-scott.com,mschwartz@scott-scott.com,efile@scott-scott.com,aslaughter@scott-scott.com
- **Martin Vincent Sinclair**
martin.sinclair@skadden.com
- **Matthew E Van Tine**
mvantine@millerlawllc.com,mvt@vantine.us

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)